

**FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

LIBERTY INSURANCE UNDERWRITERS	§	
INC.	§	
	§	
<i>PLAINTIFF</i>	§	CIVIL ACTION NO. 4:17-CV-559
	§	
	§	
DARQUEA HOME IMPROVEMENTS,	§	
L.L.C.	§	JURY TRIAL DEMANDED
	§	
<i>DEFENDANT</i>	§	

MOTION FOR VOLUNTARY DISMISSAL WITH PREJUDICE

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiff Liberty Insurance Underwriters Inc. (“LIUI”) submits this Motion for Voluntary Dismissal With Prejudice of all claims and causes of action against Defendant Darquea Home Improvements, LLC, with the parties to bear their own costs, attorneys’ fees and expenses.

To date, Defendant Darquea Home Improvements, LLC has not filed an answer or made an appearance. Attached as Exhibit A to this Motion are the dismissal order for the underlying lawsuit and approval of the minor settlements.

WHEREFORE, Plaintiff Liberty Insurance Underwriters Inc. (“LIUI”) requests that all claims asserted in this lawsuit be dismissed with prejudice and that each party bear its own costs, attorneys’ fees and expenses.

Respectfully submitted,
**THOMPSON, COE, COUSINS & IRONS,
L.L.P.**

/s/ Christina A. Culver
Christina A. Culver
State Bar No. 24078388

One Riverway, Suite 1400
Houston, Texas 77056-1988
Telephone: (713) 403-8210
Facsimile: (713) 403-8299
E-Mail: cculver@thompsoncoe.com

**ATTORNEYS FOR PLAINTIFF
LIBERTY INSURANCE UNDERWRITERS INC.**

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of December, 2018, a true and correct copy of this instrument was forwarded to all known counsel of record using the Court's CM/ECF system, in accordance with the Federal Rules of Civil Procedure and applicable Local Rules.

/s/ Christina A. Culver
Christina A. Culver